

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

NESTLÉ PURINA PETCARE COMPANY,

Plaintiff/ Counterclaim Defendant,

v.

BLUE BUFFALO COMPANY LTD.,

Defendant/ Counterclaim Plaintiff,

v.

BLUE STATE DIGITAL INC.,  
PRCG/HAGGERTY LLC and JOHN DOES 1-8,

Counterclaim Defendants.

Case No. 4:14-cv-859-RWS

**DECLARATION OF ADEEL MANGI**

I, Adeel Mangi, declare and state as follows:

1. I am a member of the firm Patterson Belknap Webb & Tyler LLP, counsel for the Blue Buffalo Company Ltd. (“Blue Buffalo”) in this action. I am familiar with the prior proceedings in this case and with the facts and circumstances of this litigation. I have been admitted *pro hac vice* in this action. I submit this declaration in support of Blue Buffalo’s Opposition to Nestlé Purina PetCare Company’s (“Nestlé Purina”) Motion to Compel.

2. A true and correct copy of a March 12, 2015 letter I sent to Richard Assmus is attached as Exhibit 1.

3. A true and correct copy of a March 17, 2015 letter I sent to Richard Assmus is attached as Exhibit 2.

4. A true and correct copy of a March 18, 2015 letter from Richard Assmus to me is attached as Exhibit 3.

5. A true and correct copy of a March 18, 2015 letter I sent to Richard Assmus is attached as Exhibit 4.

6. A true and correct copy of a March 19, 2015 letter I sent to Richard Assmus is attached as Exhibit 5.

7. A true and correct copy of a March 23, 2015 letter I sent to Richard Assmus is attached as Exhibit 6.

8. A true and correct copy of a March 24, 2015 letter I sent to Richard Assmus is attached as Exhibit 7.

9. A true and correct copy of a March 25, 2015 letter from Richard Assmus to me is attached as Exhibit 8.

10. A true and correct copy of a March 27, 2015 letter I sent to Richard Assmus is attached as Exhibit 9.

11. A true and correct copy of a March 25-27, 2015 email exchange between me, Richard Assmus, and other counsel for Blue Buffalo and Nestlé Purina is attached as Exhibit 10.

12. A true and correct copy of an excerpt from an August 18, 2014 letter from Richard Assmus to Steven Zalesin is attached as Exhibit 11.

13. A true and correct copy of an excerpt from “Plaintiff’s First Set of Requests for Production of Documents and Things to the Blue Buffalo Company Ltd.,” dated July 3, 2014, is attached as Exhibit 12.

14. A true and correct copy of an excerpt from “Plaintiff’s Second Set of Requests for Production of Documents and Things to the Blue Buffalo Company Ltd.,” dated October 31, 2014, is attached as Exhibit 13.

15. A true and correct excerpt from the transcript from the October 22, 2014 conference is attached as Exhibit 14.

Executed on March 27, 2015

/s/ Adeel Mangi  
Adeel Mangi